

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
WESTERN DIVISION

DEBRA GRAHAM and KATHLEEN HINDES)
individually and on behalf of all persons)
similarly situated as Collective representatives,)
Plaintiffs,) Case No.: 08 C 50019
v.) Honorable Judge: Kapala
RYAN INTERNATIONAL AIRLINES, INC.,) U.S. District Judge P. Michael Mahoney,
Defendant.) Magistrate Judge

PLAINTIFFS' AMENDED PROPOSED CASE MANAGEMENT ORDER

NOW COME the Plaintiffs, DEBRA GRAHAM and KATHLEEN HINDES, by and through their attorneys presenting the Plaintiff's Proposed Case Management Order, stating as follows:

1. Pursuant to Federal Rule of Civil Procedure, Rule 26(f), beginning March 18, 2008, the following individuals began to confer about the proposed case management order:

Attorney John C. Ireland for the Plaintiffs

Attorney Lori L. Hoadley for the Defendant

2. Automatic disclosures pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure are due by Plaintiffs and Defendant on April 30, 2008.
3. Alternative Dispute Resolution/Mediation. Counsels hereby certify that their clients have read the Pamphlet governing the Court's mediation program, that counsels have discussed with their respective clients the available dispute resolution options provided by the Court and private entities, and that counsels have given an estimation of the fees and costs that would be associated with the litigation of this matter through trial to their clients. Further, counsels have provided an estimate of the fees and expenses reasonably expected to be incurred through an early successful mediation. Counsels certify that they have discussed the available ADR options with their clients and have considered how this case might benefit from those options. Defense counsels certify that they have discussed the advantages and disadvantages of making a Rule 68 offer of judgment.

The parties will consider having a settlement conference with the Court after the close of fact discovery.

4. Discovery Plan. The Plaintiff's propose to the Court the following discovery plan:

- a. Discovery will be needed on the following subjects: Subjects referenced in Plaintiffs' Complaint; Defendant's Answer and Affirmative Defenses; and any defenses or other issues which are raised by either party through discovery or in any pleading. As to the format in which electronically stored information (ESI) will be produced, the parties agree to produce ESI in paper format initially, and upon request format of subsequent productions will be in "Native" format.
- b. Maximum of thirty (30) interrogatories including subparts by each party, and requests for production in accordance with the Federal Rules of Civil Procedure.
- c. Maximum number of **one hundred (100)** requests for admission by each party to any other party, unless all parties agree to allow any other party or parties to propound additional requests for admission, or unless leave of Court is obtained therefore.
- d. Maximum of ten (10) depositions by Plaintiffs and maximum of ten (10) depositions by Defendant, unless both parties agree to allow additional depositions, or unless leave of Court is obtained therefore. **The depositions shall be limited by the Federal Rule of Civil Procedure 30 (d) (1) to seven hours.**
- e. Fact discovery cut-off shall be November 28, 2008.
- f. Plaintiff shall file for a Motion for Notice of a Collective Action, under the provisions of the Fair Labor Standards Act, on or before July 31, 2008.
- g. Deadline for adding parties and amending pleadings shall be October 31, 2008.
- h. All dispositive motions will be due thirty (30) days following fact discovery cut-off, unless otherwise ordered by the Court.
- i. Rule 26(a)(2) Expert discovery schedule reserved.
- j. The parties suggest that a Final Pretrial Conference date not be scheduled at this time.
- k. The parties suggest the next discovery conference with the Court be scheduled in July, 2008.
- l. The parties anticipate being ready for trial at the third quarter of 2009.

Respectfully submitted,

DEBRA GRAHAM and KATHLEEN HINDES,
Plaintiffs

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